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 U.S. MAGISTRATE JUDGE
 BY DEC

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff

vs.

JOHN MATTHEW CHAPMAN,

Defendant.

Magistrate No. 2:20-mj-135-BNW

COMPLAINT

VIOLATIONS:

18 U.S.C. § 1201(a)(1) – *Kidnapping Resulting in Death.*

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
 Complainant, being duly sworn, deposes and states:

COUNT ONE
(Kidnapping Resulting in Death)

Beginning from a time unknown, and continuing up to and including on or about
 September 25, 2019, in the State and Federal district of Nevada and elsewhere,

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JOHN MATTHEW CHAPMAN,

defendant herein, did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold JF for ransom, reward or otherwise and, in committing or in furtherance of the commission of the offense, travelled and did willfully transport JF in interstate commerce from the State of Pennsylvania to the State of Nevada, and the death of JF resulted, all in violation of Title 18, United States Code, Section 1201(a)(1).

PROBABLE CAUSE AFFIDAVIT

1. I, Jesse Laramée, have been a Special Agent ("SA") with the FBI since September 2018, where I am assigned to the Violent Crimes Task Force in the Las Vegas Division. Prior to joining the FBI, I was a police officer for the Norfolk Police Department in Norfolk, Virginia for approximately six years. As a SA with the Violent Crimes Task Force, I investigate robbery, kidnapping, murder, and other related violent crimes. My training and experience as a law enforcement officer also includes, but is not limited to, investigating gang activity, narcotics possession and distribution, firearm offenses, financial crimes, felonious assaults, domestic disturbances, responding to critical incidents, interviewing, as well as numerous other state and local offenses.

2. The following information contained within this criminal complaint is based upon your Complainant's participation in this investigation or was provided to him by other law enforcement personnel. I have not included every fact known to me concerning this offense. I have set forth only the facts I believe are essential to establish the necessary foundation for this complaint. All times noted are approximate.

FACTS ESTABLISHING PROBABLE CAUSE

3. On November 14, 2019, at approximately 6:49 p.m., DF, called the Bethel Park Police Department in Pennsylvania to request officers check the welfare of her friend, JF, at JF's

1 residence. Officers responded to JF's residence and met with DF and JF's cousin KH. JF's
2 neighbors had been concerned because they had not physically seen JF in a few months. DF and
3 KH were concerned because they also had not spoken to JF in a few months. DF and KH said
4 that JF had become distant and both expressed concerns about her boyfriend, John CHAPMAN.
5 KH told a responding officer, Officer Weister, that JF had not answered her calls to JF's cell
6 phone, which she gave as 412-XXX-3837. However, she stated that JF did respond via Facebook
7 Messenger from JF's known Facebook account. KH told Officer Weister that she did not believe
8 that the person responding to KH on Facebook Messenger was in fact JF because the
9 communication she received was unlike JF's normal way of speaking.

10 4. Officers spoke with JF's neighbor, AK, who stated that she had not seen JF in
11 approximately two months, which was not typical. In addition, AK had not seen JF's Access
12 van, which she utilized due to her medical conditions. Neighbors CS and AK told officers that
13 they had, however, seen JF's boyfriend, John CHAPMAN, coming and going from the
14 apartment as recent as the previous day, November 13, 2019. They described the truck
15 CHAPMAN was driving as a Silver/Grey Honda Ridgeline truck. JF's neighbors also stated that
16 they had observed Chapman frequently taking large loads of trash from the apartment.

17 5. KH told Officer Weister that KH's father, KL, was placed in charge of JF's trust
18 after the death of JF's mother. It was the trust, managed by KL, who also owned JF's residence.
19 Officer Weister then contacted KL via telephone and requested permission to enter the residence
20 by force in order to check the welfare of JF. KL granted Bethel Park Police permission to use
21 force to enter the residence. KL also advised that JF was the only authorized resident and that
22 no one else should be in the residence.

23 6. Once in JF's apartment, officers noticed limited furniture and personal belongings.
24 They located a cellular phone in the kitchen next to a fake "CIA" Identification credential with

1 John CHAPMAN's name and picture. While looking for identification for JF, officers observed
2 three backpacks. One contained women's underwear and bras that were sizes larger than
3 JF's 4'1" 75 lbs. frame and another contained multiple zip ties and a roll of duct tape. DF and
4 KH continued to call JF's phone (412-XXX-3837) after officers went inside, and it was
5 determined after looking at the screen of the cellular phone located in the kitchen that the phone
6 belonged to JF.

7 7. KH relayed to the officers that she was communicating with JF's Facebook
8 messenger and received a message that JF got a new number of 724-XXX-8391. While with
9 Officer Weister of the Bethel Park Police Department, DF decided to send a text message to the
10 phone number 724-XXX-8391 about the death of a fictitious family member to see if she was
11 really talking with JF. DF sent a text message stating "call me, Uncle Ralph died." The person
12 texting from 724-XXX-8391 replied, "I'm sorry. When did he die?" DF replied "Yesterday,
13 grams been calling you I know you really liked him." The person texting from 724-XXX-8391
14 replied, "I'm sorry to be distant but the way everyone has treated me I don't feel like part of the
15 family anymore." DF confirmed to law enforcement that Uncle Ralph did not exist.

16 8. Bethel Park Police Detective Wright conducted a search of the number 724-XXX-
17 8391 and found it belonged to Ad Hoc Labs, which is the facilitator of the mobile application
18 "Burner." The "Burner" application masks the originating cellular number during
19 communication. Information provided by Ad Hoc Labs, Inc. revealed the number 724-XXX-
20 8391 was masking the originating number of 412-XXX-2113, which was identified by DF as
21 belonging to John CHAPMAN.

22 9. On November 14, 2019, Detective Marks was with DF and KH at the police
23 station when DF began receiving messages from the 724-XXX-8391 number. The messages from
24 the individual posing as JF, expressed anger that the police went to MC's (CHAPMAN's mother)

1 house and told DF that she had crossed a line. DF responded urging JF to call her, to verify she
2 was okay. CHAPMAN then called DF from number 412-XXX-2113, stating that he was going
3 to file harassment charges on her because the police were calling him. CHAPMAN then stated
4 that DF better back off because he knows how to get heroin and he would plant it on her farm
5 and she would lose her kids. CHAPMAN then hung up with DF and called the Bethel Park
6 Police Department from number 412-XXX-2113.

7 10. Bethel Park Police Department Communication Officer (CO) Johnson answered
8 the phone. CHAPMAN told CO Johnson that he last saw JF at her house earlier that day before
9 CHAPMAN drove to Maryland. CHAPMAN said that he had been in communication with JF
10 using Facebook messenger and JF's cell phone (724-XXX-8391). CHAPMAN said he urged JF
11 to call her family. CHAPMAN then stated that he would go to JF's house and bring her to the
12 Bethel Park Police Department so everyone would see that she was okay. CO Johnson asked
13 CHAPMAN to have JF call the police station now and then come in with him later. CHAPMAN
14 agreed and hung up the phone.

15 11. CHAPMAN made additional phone calls to the Bethel Park Police Department
16 from number 412-XXX-2113 and spoke to CO Johnson on November 15, 2019. CO Johnson
17 asked specific questions as to the whereabouts of JF and CHAPMAN. On multiple occasions,
18 CHAPMAN gave CO Johnson false and conflicting information as to the location and status
19 of JF.

20 12. On November 15, 2019, CHAPMAN was arrested for Pennsylvania Crime Code
21 18-7512(a) Criminal Use of Communication Facility Felony 3 and Pennsylvania Crime Code 18-
22 1501 Obstructing Administration of Law or other government functions Misdemeanor 2.
23 CHAPMAN was brought back to the Bethel Park Police Department and interviewed by
24 Detective Wright and Detective Marks. CHAPMAN was read his *Miranda* warnings, which he

1 signed acknowledging his understanding. The interview with police was recorded. During the
2 interview, the following disclosures were made by CHAPMAN:

3 At some point in mid-September 2019, CHAPMAN drove JF from her residence in Bethel
4 Park, Pennsylvania to Las Vegas, Nevada. CHAPMAN misled JF to believe the purpose of the
5 trip was a vacation with the potential of acquiring a residence in Las Vegas. However,
6 CHAPMAN had a plan to kill JF before they left Pennsylvania, and he had a kill kit ready before
7 their departure for Nevada. CHAPMAN drove JF from the State of Pennsylvania to the State of
8 Nevada. CHAPMAN and JF arrived in the Las Vegas, Nevada area on or about September 23,
9 2019. On or about September 25, 2019, CHAPMAN convinced JF to drive into the desert under
10 the pretext of participating in an S&M (somasochistic/bondage) themed photo shoot. At a
11 location in the desert in Lincoln County, Nevada where they ultimately stopped, CHAPMAN
12 stated he bound JF's hands and feet with plastic zip ties and affixed her to a signpost. He then
13 applied duct tape to her mouth and then to her nose until such time she was unable to breathe.
14 He then watched JF die from asphyxiation. When he believed she was dead, CHAPMAN took
15 her down from the signpost. He removed the tape from JF's mouth, the zip ties from her hands
16 and feet, and then took off the clothing from her body. CHAPMAN left JF's naked body next to
17 the signpost, and traveled from Nevada back to Bethel Park, Pennsylvania discarding JF's
18 clothing at various locations on the route back. CHAPMAN admitted he killed JF for her money.

19 13. Following these admissions, Allegheny County Police Detective Fitzgerald
20 contacted the Clark County Nevada Corners Office to inquire about any open/unidentified
21 deaths in their jurisdiction. Per the Clark County Coroner's Office, which also covers Lincoln
22 County, Nevada, the Lincoln County Sheriff's office reported that it had located a JANE DOE
23 decedent on October 5, 2019. The decedent fit many of the unique physical characteristics of JF
24

1 and was later positively identified as JF via dental records by the Clark County Nevada Corners
2 Office.

3 14. On November 20, 2019, Detective Dixon, obtained a signed search warrant from
4 the Honorable Judge Cashman of Allegheny County Court for CHAPMAN's cell phone.
5 Allegheny County Police Mobile Device/Computer Forensic Unit Examiner Rosenberg,
6 conducted the search on CHAPMAN's phone. In the photo application of the phone under the
7 deleted section, there were photographs of JF with date and time data. The specific dates and
8 times were September 24, 2019, 5:39:38 p.m., a photograph of JF under a "VEGAS" sign, and
9 September 25, 2019, 9:39:16 a.m., a photograph of JF bound in the desert with duct tape on her
10 mouth and zip ties securing her body to the signpost where her body was found.

11 15. Follow-up investigation revealed that CHAPMAN had continuously used JF's
12 residence following her death and passed it off as his own. Bethel Park Detective Frank Marks
13 was contacted on November 22, 2019 by CHAPMAN's girlfriend who had learned of the
14 investigation from the media. His girlfriend explained for their second date, on September 28,
15 2019, CHAPMAN picked her up and brought her back to JF's residence. CHAPMAN told her
16 that the residence belonged to his uncle who recently passed away. CHAPMAN also told her
17 that he was employed as an Allegheny County Jail Guard. The two continued to date until
18 CHAPMAN's arrest.

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CONCLUSION

16. Based on the above facts and circumstances, your Complainant believes there is probable cause that **JOHN MATTHEW CHAPMAN**, did commit a violation of 18 U.S.C. § 1201(a)(1) – *Kidnapping Resulting in Death*.

Respectfully submitted,

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Jesse Laramée, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

This 20th day of February, 2020.

BRENDA WEKSLER

HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

I attest and certify on 2/20/2020 that
this is a full true and correct copy of the
original document.

BRENDA WEKSLER
U.S. MAGISTRATE JUDGE
DISTRICT OF NEVADA

By DEC Deputy
Secretary